

## [EXTERNAL] Federal Register Comment OMB Control #1018-Friends

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### FEDERAL REGISTER COMMENT OMB CONTROL #1018-FRIENDS FILED JANUARY 8, 2021

Friends of the Front Range Wildlife Refuges (FFRWR)-Colorado submits the following comments.  
First, a profile. FFRWR :

- Is registered and current with Colorado Secretary of State as a 501(c)(3) non-profit organization.
- Annually files a 990 Long Form and is current with the IRS.
- Has a signed and current Partnership Agreement with the USFWS.
- Uses Generally Accepted Accounting Principles (GAAP) to guide its finance and accounting.
- Retains professional, respected accounting firms for services as needed.
- Invites FWS staff to review monthly financials, profit/loss statements at each board meeting.

No doubt the business sense and capacity of all Friends vary greatly. Therefore, equity is required. On that basis, FFRWR suggests the following:

1. Separate Friends that file taxes using the IRS Long Form from those that file using the Short Form/Postcard.

Accept as sufficient the financial information from the 990 Long Form. If it is good enough for the IRS, it should be good enough for FWS. There is no paperwork burden. It standardizes information between agencies. And information transfer is instantaneous. Ask these Friends to opt-in to confirm and permit this information exchange.

Short Form/Postcard filers will require a separate procedure.

Yes, many excel in biology not business but give discretion to the refuge manager to determine which organizations still need to provide information. If one group runs a de minimis business operation, defined by some dollar amount, allow the refuge manager, in consultation with and approval by the regional office, to grant an exemption.

For others allow a one-year grace period to encourage postcard filers to switch to the Long Form. After one year create a watch list of groups that will be coached by FWS and appropriate supporting associations to file Long Forms. Review and revise this policy and procedure after five years.

2. Eliminate the proposed collection of resumes for Friends' staff that work in visitor centers. FWS will get resumes mostly from the first-job-out-of-college or the newly retired. If FWS is looking for special skills or talents,

the refuge manager will know.

Friends of the Front Range Wildlife Refuges thanks you for this opportunity to comment. And It appreciates FWS staff who were available under difficult outreach times for questions and answers.

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